

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

IN RE: : CHAPTER 13
:
Travis J. Wells, : CASE NO. 13-41646-EJC

**RESPONSE TO MOTION TO AVOID LIEN PURSUANT TO 11 U.S.C. SECTION
522(f)(1)(A)**

COMES NOW, Sheffield Financial, hereinafter "Sheffield", by and through its attorney of record, and files its Response to Debtor's Motion to Avoid Lien (hereinafter the "Objection") and states the following:

1.

Sheffield admits allegations set forth under Paragraphs 1 and 2 of Debtor's Motion.

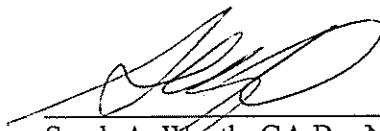
2.

Sheffield neither admits nor denies allegations set forth under Paragraph 3 of Debtor's Motion.

3.

Sheffield responds to allegations set forth under Paragraph 4 of Debtor's Motion to state that Sheffield's lien on the four wheeler that is owned by Debtor is not eligible for lien avoidance under 11 U.S.C. Section 522(f)(1)(A) or (f)(1)(B) as it is neither a judicial lien or within a category contained under the provisions of (f)(1)(B). More specifically, the four wheeler is not a household good nor a tool of the trade of Debtor's. Sheffield's lien is secured by a UCC-1 Financing Statement, a true copy of which is attached herein under Exhibit "A".

WHEREFORE, Sheffield requests that the Debtor's motion be denied and for further relief as is deemed equitable and just.



Sarah A. Wyeth, GA Bar Number: 779413
Attorney for Sheffield Financial

Campbell and Brannon, LLC

Sarah A. Wyeth
990 Hammond Drive, Suite 800
Atlanta, Georgia 30328
(770) 392-0041

CERTIFICATE OF SERVICE

I certify that on the date below that a true and correct copy of the foregoing was sent, postage prepaid, by regular U.S. Mail to the parties listed below, and by facsimile to the Chapter 13 Trustee and the Attorney for the Debtor.

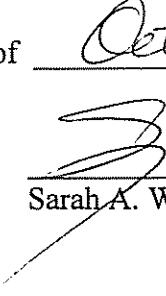
John E. Pytte
PO Box 949
Hinesville GA 31310

Travis J. Wells
PO Box 2115
Hinesville GA 31310

Benjamin R. Roach
423 Bull Street
Savannah GA 31401

Office of the US Trustee
Johnson Square Business Center
2 East Bryan Street, Ste. 725
Savannah GA 31401

Respectfully submitted this 10 day of Oct, 2013.


Sarah A. Wyeth, GA Bar 779413

Campbell and Brannon, LLC
Suite 800, 990 Hammond Dr.
Atlanta GA 30302
770-392-0041

FILED AND RECORDED
 04/19/2011 11:48AM at 11:48AM
 UCC Control #: 0072011007786
 R.B. MCINTYRE
 BARROW County Clerk of Superior Court
 Receipt # 288898

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS (front and back) CAREFULLY

A. NAME & PHONE OF CONTACT AT FILER (optional) Phone: (800) 331-3282 Fax: (818) 662-4141	
B. SEND ACKNOWLEDGEMENT TO: (Name and Address) 19779 SHEFFIELD FINA	
CT Lien Solutions P.O. Box 29071 Glendale, CA 91209-9071	28002756 GAGA
File with: BARROW, GA	

1. DEBTOR'S EXACT FULL LEGAL NAME - insert only one debtor name (1a or 1b) - do not abbreviate or combine names

1a. ORGANIZATION'S NAME				
OR				
1b. INDIVIDUAL'S LAST NAME WELLS	FIRST NAME TRAVIS	MIDDLE NAME	SUFFIX	
1c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
1d. SEE INSTRUCTIONS	ADD'L INFO RE ORGANIZATION DEBTOR	1e. TYPE OF ORGANIZATION	1f. JURISDICTION OF ORGANIZATION	1g. ORGANIZATIONAL ID #, if any <input type="checkbox"/> NONE

2. ADDITIONAL DEBTOR'S EXACT FULL LEGAL NAME - Insert only one debtor name (2a or 2b) - do not abbreviate or combine names

2a. ORGANIZATION'S NAME				
OR				
2b. INDIVIDUAL'S LAST NAME	FIRST NAME	MIDDLE NAME	SUFFIX	
2c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
2d. SEE INSTRUCTIONS	ADD'L INFO RE ORGANIZATION DEBTOR	2e. TYPE OF ORGANIZATION	2f. JURISDICTION OF ORGANIZATION	2g. ORGANIZATIONAL ID #, if any <input type="checkbox"/> NONE

3. SECURED PARTY'S NAME (or NAME of TOTAL ASSIGNEE of ASSIGNOR S/P) - insert only one secured party name (3a or 3b)

3a. ORGANIZATION'S NAME BB&T Financial, FSB - Sheffield Financial				
OR				
3b. INDIVIDUAL'S LAST NAME	FIRST NAME	MIDDLE NAME	SUFFIX	
3c. MAILING ADDRESS PO Box 1704	CITY Clemmons	STATE NC	POSTAL CODE 27012	COUNTRY USA

4. This FINANCING STATEMENT covers the following collateral:

THE FOLLOWING LISTED EQUIPMENT: MAKE: Arctic Cat; MODEL No.: A2010IFT4EUSA; VIN/SN: 4UF10ATV9AT203141 ALONG WITH ALL ADDITIONS, MODIFICATIONS, AND EXCHANGES TO THE SUBJECT EQUIPMENT TO INCLUDE SPECIAL TOOLS AND EQUIPMENT NEEDED FOR ITS SERVICE AND REPAIR, AND ALL OTHER EQUIPMENT NOW OWNED AND HEREAFTER ACQUIRED THAT IS FINANCED BY SHEFFIELD FINANCIAL.

EXHIBIT

"A"

5. ALTERNATIVE DESIGNATION (if applicable)	<input type="checkbox"/> LESSEE/LESSOR	<input type="checkbox"/> CONSIGNEE/CONSIGNOR	<input type="checkbox"/> BAILEE/BAILOR	<input type="checkbox"/> SELLER/BUYER	<input type="checkbox"/> AG. LIEN	<input type="checkbox"/> NON-UCC FILING
6. <input type="checkbox"/> This FINANCING STATEMENT is to be filed (or record) (or recorded) in the REAL ESTATE RECORDS. Attach Addendum (if applicable)	7. Check to REQUEST SEARCH REPORT(S) on Debtor(s) (ADDITIONAL FEE) (optional)			<input type="checkbox"/> All Debtors	<input type="checkbox"/> Debtor 1	<input type="checkbox"/> Debtor 2
8. OPTIONAL FILER REFERENCE DATA						

BB&T CONFIDENTIAL